

Objection Deadline: January 21, 2023 at 4:00 p.m. prevailing Eastern Time

Hearing Date: January 24, 2023 at 11:00 a.m. prevailing Eastern Time

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
	:	
VOYAGER DIGITAL HOLDINGS, INC., et al.,	:	Case No. 22-10943 (MEW)
	:	
	:	Jointly Administered
Debtors.	:	
	:	
-----X	:	

**NOTICE OF CELSIUS NETWORK LLC'S MOTION FOR ORDER (I) LIFTING
THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. 362(d)(1) AND
BANKRUPTCY RULE 4001 AND (II) GRANTING LEAVE TO FILE LATE PROOF OF
CLAIM PURSUANT TO BANKRUPTCY RULES 3003(c) AND 9006(b)(1)**

PLEASE TAKE NOTICE that Celsius Network LLC ("Celsius") hereby submits the following Motion for entry of an order (i) lifting the automatic stay pursuant to section 362(d)(1) of title 11 of the United States Code (the "Bankruptcy Code") and Rule 4001 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") to permit commencement of an adversary proceeding against Voyager Digital LLC ("Voyager") to recover preferential transfers and (ii) extending, nunc pro tunc, Celsius' time to file a proof of claim in this action despite passage of the bar date (the "Motion") pursuant to Bankruptcy Rules 3003(c)(3) and 9006(b)(1).

In support of the Motion, Celsius submits the contemporaneously filed (i) Declaration of Holden Bixler in Support of Motion to Lift Stay and Motion for Leave to File Late Proof of Claim; (ii) Declaration of Christopher Ferraro in Support of Motion to Lift Stay and Motion for Leave to File Late Proof of Claim; and (iii) Declaration of Mitchell Hurley in Support of Motion to Lift Stay and Motion for Leave to File Late Proof of Claim. Celsius respectfully moves this Court for an Order: (i) lifting the automatic stay in this Chapter 11 case to permit Celsius to commence an adversary proceeding in Celsius' Chapter 11 case in order to pursue a preference action against Voyager, (ii) granting leave under Bankruptcy Rules 3003(c) and 9006(b)(1) extending, nunc pro tunc, Celsius' time to file a proof of claim to within 14 days of a decision granting such relief, and (iii) granting Celsius such other and further relief as the Court deems just, equitable and proper.

A hearing on the Motion will be held before the Honorable Michael Wiles on **January 24, 2023, at 11:00 a.m., prevailing Eastern Time**. In accordance with General Order M-543 dated March 20, 2020, the Hearing will be conducted telephonically. Any parties wishing to participate must do so by making arrangements through CourtSolutions by visiting <https://www.court-solutions.com>.

PLEASE TAKE FURTHER NOTICE that copies of the Motion and other pleadings filed in these chapter 11 cases may be obtained free of charge by visiting the website of Stretto at <https://cases.stretto.com/Voyager>. You may also obtain copies of the Motion and other pleadings filed in these chapter 11 cases by visiting the Court's website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion (the "Objections") shall (i) be in writing; (ii) state the name and address of the objecting party and nature of the claim or interest of such party; (iii) state with particularity the legal and factual bases

of such objection; (iv) conform to the Bankruptcy Rules, the Local Bankruptcy Rules for the Southern District of New York, and the Case Management Order [No. 22-10943, Docket No. 240]; (v) be filed electronically with the Court on the docket of *In re Voyager Digital Holdings, Inc.* v. No. 22-10943 (MEW) by registered users of the Court's electronic filing system and in accordance with all General Orders applicable to chapter 11 cases in the United States Bankruptcy Court for the Southern District of New York (which are available on the Court's website at <http://www.nysb.uscourts.gov>); (vi) be served so as to be actually received by entities on the Master Service List by the deadline; and (vii) that pursuant to the Case Management Order the objection deadline shall be the later of (i) 14 calendar days after the filing and service of the Motion or (ii) three calendar days prior to the hearing scheduled with respect thereto, which is January 21, 2023.

PLEASE TAKE FURTHER NOTICE that any objecting parties are required to attend the Hearing, and failure to appear may result in relief being granted upon default.

Dated: December 13, 2022
New York, New York

AKIN, GUMP, STRAUSS, HAUER & FELD LLP

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